

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

MARTÍN JONATHAN BATALLA  
VIDAL, *et al.*,

Plaintiffs,

v.

No. 16-cv-4756 (NGG) (VMS)

ALEJANDRO N. MAYORKAS, *et al.*,

Defendants.

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

No. 17-cv-5228 (NGG) (VMS)

JOSEPH R. BIDEN, JR., *et al.*,

Defendants.

**NOTICE**

Defendants respectfully submit the declaration of Tracy L. Renaud, Acting Deputy Director, USCIS, attached as Exhibit A, regarding the scope of the inadvertent computer coding error identified in Defendants' August 17, 2021 notice to the Court, ECF No. 371, and USCIS's remedial efforts to correct that error and ensure it does not reoccur. As explained further in Ms. Renaud's declaration, all Employment Authorization Documents (EADs) that were delayed as a result of this inadvertent error have since been produced and mailed via USPS Priority Mail. Renaud Decl. ¶¶ 10, 12-13. In light of these efforts, USCIS does not believe that any affected EADs will have expired before a replacement EAD would have issued. *Id.* ¶ 14. USCIS has also

reviewed the coding logic for future batches of EADs to ensure that this coding error does not reoccur. *Id.* ¶ 15. Defendants appreciate the Court's and Plaintiffs' understanding.

Dated: August 24, 2021

Respectfully submitted,

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